

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	Case No.: 18-02041 HWV
RICARDO A READ-BAEZ	Chapter: 13
Debtor(s)	

**ENTRY OF APPEARANCE AND REQUEST
FOR SERVICE OF PAPERS, RECEIPT OF
NOTICES, AND INCLUSION ON NOTICE LIST**

TO THE CLERK OF THE BANKRUPTCY COURT:

PLEASE enter the appearance of on behalf of TOWNE MORTGAGE COMPANY.

PLEASE TAKE NOTICE that the undersigned law firm is counsel for a party in interest in the above-captioned case, and, pursuant to Bankruptcy Rules 2002 and 9007, our client respectfully requests that all notices given or required to be given in this case and in any adversary proceedings by the Court, the Debtor, any Creditors' Committee, any Trustee, the United States Trustee, any Trustee subsequently appointed, and/or any other party in interest in this case be given to the undersigned counsel at the addresses and to the persons, telephone numbers and telecopier set forth below. This request includes, without limitation, all orders, notices, hearing dates, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statement of affairs, operating reports, plans of reorganization, and disclosure statements, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, delivery service, telephone, telegraph, telex, telecopier, or otherwise:

TOWNE MORTGAGE COMPANY
ATTN:
FEIN, SUCH, KAHN & SHEPARD, P.C.
7660 Imperial Way, Suite 121
Allentown, Pennsylvania 18195
(610) 395-3535
Email: bankruptcy@fskslaw.com

PLEASE TAKE FURTHER NOTICE that client intends that neither this notice of appearance nor any later appearance, pleading, claim or suit shall waive (i) client's rights to have orders in non-core matters entered only after de novo review by a District Judge, (ii) client's right to trial by jury in any proceeding so triable in this case or any other cases, controversies or proceedings related to this case, (iii) client's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) client's right to have the Bankruptcy Court and the District Court abstain in any matter subject to mandatory or discretionary abstention or (v) any other rights, claims, actions, defenses, set-offs or recoupments to which client is or may be entitled under agreements or in law or in equity, all of which rights, claims, actions, defenses, set-offs and recoupments client expressly reserves.

Date: November 17, 2020

By: /s/ Tammy L. Terrell Benozza

I hereby certify that copies of this Entry of Appearance were served by ECF notice
(electronically) upon:

<u>Debtor's Counsel:</u> Gary J Imblum Imblum Law Offices, P.C. 4615 Derry Street Harrisburg, PA 17111	<u>Assistant US Trustee:</u> United States Trustee 228 Walnut Street, Suite 1190 Harrisburg, PA 17101
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<u>Trustee (if applicable):</u> Charles J DeHart, III 8125 Adams Drive, Suite A Hummelstown, PA 17036	
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This office caused to be mailed a copy of this pleading by regular mail the same in a sealed envelope, with postage prepaid thereon, addressed to the last known addresses as indicated below:

Debtor(s):

RICARDO A READ-BAEZ